

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

---

FREDERICK J. GREDE, as Liquidation Trustee of the Sentinel Liquidation Trust,	)	
	)	
Plaintiff,	)	Case No. 08CV6587
	)	
v.	)	Judge James B. Zagel
	)	
STEPHEN M. FOLAN, et al.,	)	
	)	
Defendants.	)	
	)	

---

---

FREDERICK J. GREDE, as Liquidation Trustee of the Sentinel Liquidation Trust,	)	
	)	
Plaintiff,	)	Case No. 09CV2258
	)	
v.	)	Judge James B. Zagel
	)	
	)	
FTN FINANCIAL SECURITIES CORP., et al.,	)	
	)	
	)	
	)	
Defendants.	)	

---

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that on June 3, 2011, at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable James B. Zagel, or any Judge sitting in his stead, in the courtroom, normally occupied by him in the United States District Court for the Northern District of Illinois, Eastern Division, 219 Dearborn Street, Room 2503, Chicago, Illinois, and shall then present the concurrently filed, **JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER WITH THE COMMODITIES FUTURES TRADING COMMISSION**, which is hereby served upon you.

Dated: May 18, 2011

Respectfully submitted,

/s/ Michael B. Slade

Brian D. Sieve, P.C. (ARDC #6199741)  
Michael B. Slade (ARDC #6274231)  
KIRKLAND & ELLIS LLP  
300 N. LaSalle Street  
Chicago, Illinois 60654  
Telephone: (312) 861-2000  
Facsimile: (312) 861-2200

Howard M. Shapiro  
Patrick J. Carome  
John A. Valentine  
WILMER CUTLER PICKERING HALE  
AND DORR LLP  
1875 Pennsylvania Avenue, N.W.  
Washington, DC 20006  
Telephone: (202) 663-6000  
Facsimile: (202) 663-6363

Mark D. Griffin  
Lori H. Patterson  
Kristine L. Robert  
BAKER, DONELSON, BEARMAN, CALDWELL &  
BERKOWITZ, PC  
First Tennessee Building  
165 Madison Avenue, Suite 2000  
Memphis, Tennessee 38103  
Telephone: (901) 526-2000  
Facsimile: (901) 577-0870

***Attorneys for Defendants Stephen M. Folan, Jacques  
de St. Phalle, and FTN Financial Securities Corp.,  
and First Tennessee Bank, N.A.***

William Gibbs Sullivan  
Royal B. Martin  
Mason N. Floyd  
MARTIN, BROWN, SULLIVAN, ROADMAN  
& HARTNETT, LTD  
135 S. LaSalle St., Ste. 3200  
Chicago, IL 60603  
Phone: (312) 360-5000

*Attorneys for Stephen M. Folan and Jacques de St.  
Phalle*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **NOTICE OF MOTION** was filed with the Clerk of the Court on May 18, 2011, which will send notification of such filings to the parties registered with the Court's CM/ECF system, including the recipients shown below.

Chris C. Gair  
Anne Paffrath Ray  
Gregory M. Boyle  
J. Kevin McCall  
Jeffrey Scot Eberhard  
Kevin Case  
Vincent E. Lazar  
JENNER & BLOCK LLP  
353 N. Clark Street  
Chicago, IL 60654

I also certify that said notice was sent to the below party via electronic mail:

Martin B. White  
COMMODITIES FUTURES TRADING COMMISSION  
Three Lafayette Centre  
1155 21st Street, NW  
Washington, DC 20581  
*Attorney for the CFTC*